

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

Boris A. Miksic,

Court File No. 15-cv-00539-JRT-BRT

Plaintiff,

v.

Boeckermann Grafstrom Mayer, LLC, a
Minnesota limited liability company, f/k/a
Johnson, West & Co. P.L.C., Boeckermann
Grafstrom Mayer, P.A., and Johnson West
& Co. P.L.C.

**MOTION FOR LEAVE TO AMEND
COMPLAINT TO ALLEGE PUNITIVE
DAMAGES**

Defendants.

**TO: DEFENDANTS ABOVE NAMED AND THEIR ATTORNEYS
MICHAEL T. BERGER, HINSHAW & CULBERTSON LLP, 333 South
Seventh Street, Suite 2000, Minneapolis, MN 55402**

Plaintiff respectfully moves this Court pursuant to Fed. R. Civ. P. 15(a), for leave to amend its Second Consolidated/Amended Complaint to reflect the proposed amended complaint filed herewith. This Motion is based upon the files, records and proceedings herein, as well as the accompanying memorandum of law, and arguments of counsel.

Dated: March 31, 2016

By: s/Gregory J. Stenmoe

Gregory J. Stenmoe

Britt M. Gilbertson

Michael M. Sawers

Bar Number 131155

Bar Number 034977X

Bar Number 392437

Attorneys for Plaintiff Boris A. Miksic

Briggs and Morgan, P.A.

2200 IDS Center

80 South Eighth Street

Minneapolis, Minnesota 55402-2157

Telephone: (612) 977-8400

Fax: (612) 977-8650

gstenmoe@briggs.com

bgilbertson@briggs.com

msawers@briggs.com